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Hon. Mary Jo Heston
Chapter 13
Hearing date: Thur. May 16, 2019
at 1:00 p.m.
Response Date: May 9, 2019

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN
DISTRICT OF WASHINGTON AT TACOMA

In re:

JENIFER LEE CAREY, and MARIO D.
CAREY,

Debtors.

NO. 18-40496-MJH

MOTION OF SECURED CREDITOR
AMERICA'S CREDIT UNION FOR RELIEF
FROM AUTOMATIC STAY

COMES NOW America's Credit Union by and through its attorneys, Siderius, Lonergan & Martin, LLP, and moves the court for relief from the automatic stay provisions of 11 USC § 362. Said secured creditor holds a perfected security in a 2011 Ford F-150 automobile. Secured creditor America's Credit Union requests relief from the stay to allow repossession of said vehicle. Secured party also requests waiver of the provisions of BR 4001 (a)(3) so that it may forthwith commence or continue repossession through appropriate legal channels. The factual basis for this motion is set forth in the declaration submitted herewith.

DATED this 11th day of April, 2019.

/s/ Michael Siderius
Michael Siderius, of
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Attorneys for America's Credit Union
WSBA #25510